



City of Anaheim

**PUBLIC UTILITIES DEPARTMENT**

Integrated Resources Division

March 16, 2009

Vicky Lee  
Air Quality Engineer  
South Coast Air Quality Management District  
21865 Copley Drive  
Diamond Bar, CA 91765-4178

**DOCKET**

**07-AFC-9**

DATE 03/16/09

RECD. 04/17/09

Subject: Comments to the February 18, 2009 Preliminary Determination of Compliance (PDOC) for Canyon Power Plant, Facility I.D. 153992.

Dear Ms. Lee:

The City of Anaheim has reviewed the above referenced PDOC and has the following comments:

1. Section H, Page 10, System 3, Inorganic Chemical Storage: Delete fixed roof and replace with ASME Pressure Vessel
2. Section H, Page 10, Condition D82.2 for the gas turbines. The intent is to clarify when the RATA testing of the NOx CEM will be done and the following is provided as a redline strikeout excerpt from the PDOC:

D82.2 The operator shall install and maintain a CEMS to measure the following parameters:

NOx concentration in ppmv

Concentrations shall be corrected to 15 percent oxygen on a dry basis.

The CEMS shall be installed and operating no later than 90 days after initial start-up of the ~~turbine and shall comply with the requirements of Rule 2012.~~ Rule 2012 provisional RATA testing shall be completed and submitted to the AQMD within 90 days of the conclusion of the gas turbine commissioning period. During the interim period between the initial start-up and the provisional certification date of the CEMS, the operator shall comply with the monitoring requirements of Rule 2012(h)(2) and 2012(h)(3). Within two weeks of the turbine start-up date, the operator shall provide written notification to the District of the exact date of start-up.

~~The CEMS shall be installed and operating (for BACT purposes only) no later than 90 days after initial start-up of the turbine.~~

[RULE 1703(a)(2)-PSD-BACT, 10-7-1988; RULE 2005, 5-6-2005; RULE 2012, 5-6-2005]


[Devices subject to this condition: D1, D7, D13, D19]

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Anaheim, California 92805

TEL (714) 765-4250  
FAX (714) 765-4140

If you have any questions or would like to discuss, I can be reached at 714-765-4112.

Sincerely,

A handwritten signature in cursive script, appearing to read 'Suzanne'.

Suzanne Wilson

City of Anaheim Public Utilities Department



**BEFORE THE ENERGY RESOURCES CONSERVATION AND DEVELOPMENT  
COMMISSION OF THE STATE OF CALIFORNIA  
1516 NINTH STREET, SACRAMENTO, CA 95814  
1-800-822-6228 – [WWW.ENERGY.CA.GOV](http://WWW.ENERGY.CA.GOV)**

**APPLICATION FOR CERTIFICATION  
FOR THE *CANYON POWER*  
*PLANT PROJECT***

**Docket No. 07-AFC-9**

**PROOF OF SERVICE**

*(Revised 2/25/2009)*

**APPLICANT**

Southern California Public Power Authority  
(SCPPA)  
c/o City of Anaheim  
Public Utilities Department  
Steve Sciortino, Project Manager  
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**APPLICANT CONSULTANT**

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130 Robin Hill Road, Suite 100  
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**COUNSEL FOR APPLICANT**

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**INTERESTED AGENCIES**

California ISO  
[e-recipient@caiso.com](mailto:e-recipient@caiso.com)

**INTERVENORS**

**ENERGY COMMISSION**

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### DECLARATION OF SERVICE

I, Maria Santourdjian, declare that on April 17, 2009, I served and filed copies of the attached City of Anaheim Comments on Canyon Power Plant. The original document, filed with the Docket Unit, is accompanied by a copy of the most recent Proof of Service list, located on the web page for this project at:

**[<http://www.energy.ca.gov/sitingcases/canyon/index.html>]**. The document has been sent to both the other parties in this proceeding (as shown on the Proof of Service list) and to the Commission's Docket Unit, in the following manner:

#### ***(Check all that Apply)***

##### **For service to all other parties:**

✓ sent electronically to all email addresses on the Proof of Service list;

✓ by personal delivery or by depositing in the United States mail at Sacramento, California with first-class postage thereon fully prepaid and addressed as provided on the Proof of Service list above to those addresses **NOT** marked "email preferred."

**AND**

##### **For filing with the Energy Commission:**

✓ sending an original paper copy and one electronic copy, mailed and emailed respectively, to the address below (preferred method);

**OR**

\_\_\_\_\_ depositing in the mail an original and 12 paper copies, as follows:

#### **CALIFORNIA ENERGY COMMISSION**

Attn: Docket No. 07-AFC-9  
1516 Ninth Street, MS-4  
Sacramento, CA 95814-5512

[docket@energy.state.ca.us](mailto:docket@energy.state.ca.us)

I declare under penalty of perjury that the foregoing is true and correct.

Original Signature in Dockets  
Maria Santourdjian